

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Roger C. by and through his)	
next friend, Shelley Gilbert)	
Plaintiff,)	Civil Action: 08cv1254
v.)	Judge St. Eve
)	Magistrate Judge Schenkier
Valley View Public School District, 365-U)	
Alan Hampton, Bollingbrook Police)	
Don Laverty)	
Timothy Gavin)	
Steven Proehl)	
Defendants.)	

MEMORANDUM IN SUPPORT OF MOTION FOR FEES

NOW COMES [child] Plaintiff Roger C. with his next friend Shelley Gilbert and both represented by their attorney, Christopher C. Cooper and that their attorney states as follows:

- (1) Roger Coronado is a 15 year-old child.
- (2) Plaintiff's counsel is representing Roger Pro Bono.
- (3) Defense counsel for Valley View School District did not respond to plaintiff's request for a video (please see attached Notice to Produce and Motion to Compel Video).

Additionally, attorneys for the School District failed to respond the related L.R. 37.2 letter sent to them.

- (4) Plaintiff's counsel had to prepare a L.R. 37.2 letter; two motions; two supporting memoranda; two notices of motion; and may have to appear on September 3, 2008 to argue the Fees motion and Motion to Compel.

WHEREFORE, plaintiff's counsel respectfully asks this Honorable Court to order the School District to compensate him \$125.00 for his having to prepare 7 documents pursuant to non compliance by Mr. Ulm and Mr. Riordan (Valley View counsel).

Respectfully submitted, s\Christopher Cooper, ESQ., PHD., 26 August 2008
Counsel for Plaintiff
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PROOF OF SERVICE: I, the undersigned, swear that I transmitted the foregoing through ECF on August 26, 2008 and that the defendants' attorneys are registered e-filers.
s\Christopher C. Cooper

